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Via ECF

Hon. Magistrate Judge Taryn A. Merkl  
U.S. District Court  
Eastern District of New York

Re: Ningbo Easyclean Commodity Co. v. Splaqua,  
Civil Action: 22-cv-05575-RPK-TAM

Dear Judge Merkl:

I represent Plaintiffs in the above-referenced action.

Defendants' Reply Memorandum of Law in Support of their Motion to Vacate their Certificate of Default (*Dkt 23*) states at bottom of page 5:

**Exhibit 1 demonstrates that Splaqua was not properly served with the Complaint, and, Dackers has yet to receive any service.**

This sentence is at best a reckless misrepresentation, if not a deliberate falsity. Exhibit 1 (*Dkt 23-1*) demonstrates nothing other than that Defendant Splaqua Inc., was served via the NY Secretary of State on September 28, 2022, (as accurately alleged in Plaintiff's Motion for Entry of Default).

Plaintiffs respectfully request that the Court draw the appropriate inferences as to the accuracy and good faith (or lack thereof) of the remainder of Defendants' motion papers, given the aforementioned blatant misstatement.

Sincerely;

s/ Gerry Grunsfeld

Lazar Grunsfeld Elnadav LLP